

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN
MADISON DIVISION

KATIE MCGLENN on behalf of her minor daughter,
LAUREN ENGLE, MARGARET MCGLENN,
KYLIE KAVANAUGH, LILLIAN XISTRIS, ADELINE XISTRIS,
SYDNEY MARZ, ANNIE PARENTEAU, and JEFF HAUPT,
on behalf of his minor daughter, ALAYNA TUCKER,

Case No. 3:21-CV-683

Plaintiffs,

vs.

MADISON METROPOLITAN SCHOOL DISTRICT,
DAVID KRUCHTEN, HEIDI TEPP, JOE FANNING,
and JOE BALLEES d/b/a JB PUBLIC SAFETY CONSULTING,
LLC, each in his or her individual capacity,

Defendants.

NOTICE OF MOTION AND MOTION TO INTERVENE

PLEASE TAKE NOTICE that proposed intervenor-defendant Auto-Owners Insurance Company, by its attorneys, Nash, Spindler, Grimstad & McCracken, LLP, pursuant to the provisions of Rule 24 of the Federal Rules of Civil Procedure, at a date and time to be set by this Court or upon which time counsel may be heard, will move this Court for an Order allowing it to intervene as a party defendant for purposes of protecting its interests and filing a pleading to raise coverage issues with regard to an insurance policy issued to Defendant Joe Fanning.

The grounds for said motion are set forth in the accompanying Brief and Affidavit of Beau W. Krueger.

Dated this 16th day of May, 2023.

NASH, SPINDLER, GRIMSTAD & McCracken, LLP

/s/ Beau W. Krueger

By: _____

Jeremy T. Gill

State Bar No. 1034152

Beau W. Krueger

Attorney for Intervening Defendant

Auto-Owners Insurance Company

Mailing Address

PO Box 130

Manitowoc, WI 54221-0130

Telephone: (920) 684-3321

Facsimile: (920) 684-0544

jgill@nashlaw.com

bkrueger@nashlaw.com